

From: [Miano, John \(DEP\)](#)
To: [Casey, Carolyn](#)
Cc: [Wainberg, Daniel](#); [Knox, Rosemary \(DEP\)](#); [Johnson, Stephen \(DEP\)](#)
Subject: Beverly, draft USM order for your review
Date: Wednesday, June 01, 2016 2:51:48 PM

Hi Carolyn,

At your request, the Massachusetts Department of Environmental Protection (MassDEP) reviewed the draft USEPA Administrative Order On Consent (AOC), and the Cover Letter and Statement of Work, for the Former United Shoe Machinery facility, 181 Elliot Street, Beverly. This site has been assigned MassDEP Release Tracking Numbers (RTN) 3-610 and 3-14836.

MassDEP has provided USEPA with technical reviews of several documents associated with this site between 2013 and 2016, focusing primarily on the potential for vapor intrusion to schools and daycares in facility buildings. Specific locations for which vapor intrusion evaluations were conducted by MassDEP included the Bright Horizons Children's Center, Futures Behavior Therapy Center, New England Academy, and Beverly Children's Center.

MassDEP's review of the AOC focused on sections of the document where MGL c21E and the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000, are applicable, and primarily on vapor intrusion issues.

USEPA notes in the AOC cover letter that EPA has notified MassDEP of this AOC and the need for more investigation information, and states that "MassDEP agrees with EPA's decision to issue the AOC". In a July 2015 communication to USEPA, MassDEP indicated that we have no objections regarding an Order or the taking of any other action deemed appropriate by USEPA. However, since MassDEP is not a party or signatory to USEPA's Order, nor been involved with any of the meetings or negotiations with the PRPs, it seems inappropriate to refer to an agreement with USEPA's decision to issue an Order. Furthermore, your draft cover letter includes issues such as potential ecological risk, residual PCB contamination, and the status of all USTs. Since our focus has been on the vapor intrusion concerns that you have raised, we are not in a position to agree at this time with your requirements on other matters at the Site.

Several action items are listed in the USEPA draft documents related to the site assessment and the need for response and/or pathway elimination for the vapor intrusion pathway.

USEPA indicates that further response actions and or remedial actions are needed at the facility buildings to further address the vapor intrusion pathways. MassDEP has evaluated the groundwater, soil vapor, and indoor air data, and considered the related lines of evidence for vapor intrusion for several buildings at the facility. MassDEP's evaluation of this case found that the lines of evidence indicate that vapor intrusion at Building 100 is likely resulting from, at least partly, petroleum vapor contamination beneath Building 100. Therefore, unless an indoor source was/is found, rather than continued periodic indoor air sampling, MassDEP's vapor intrusion guidance recommends indoor air filtration in the children's classrooms and an evaluation of the feasibility of a more long term remedy approach such as sub-slab depressurization. Lines of evidence supporting the likelihood that the indoor air levels of Air Phase Petroleum fractions in Building 100 are from subsurface vapor intrusion include the following:

1. APH chromatograms of soil vapor are very similar to APH chromatograms of indoor air;
2. All indoor air samples collected from 2012 to 2015 have levels in indoor air exceeding MassDEP Residential Threshold Values;
3. Nine of ten indoor air samples collected from 2012 to 2015 have levels in indoor air exceeding MassDEP Commercial Threshold Values;
4. During sub-slab soil vapor collection in March 2015, a petroleum odor was found to be emanating from sub-slab soil vapor core SG-1, and was documented in the FSL March 2015 sampling Report;
5. Sub-slab soil vapor APH levels are present at Building 100, (SG-4, C9-C18 maximum value = 3700 ug/m3);
6. Several gasoline storage tanks were formerly located in the vicinity of Building 100;
7. Historic groundwater testing results by gas chromatograph identified mineral spirits and gasoline in GSB201-OW. This well was located near the former gasoline USTs in the vicinity of Building 100, and the Chip Shed operations; and
8. There is a lack of documentation of any indoor source of APH contamination.

MassDEP appreciates the opportunity to review the USEPA AOC documents, and we hope our comments are helpful.

Steve Johnson suggested that we have a conf call with you on Friday, to follow-up on this email. Are you available Friday afternoon for a discussion?

Regards,
Jack

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MassDEP e-newsletter: mass.gov/dep/public/publications/enews.htm
MassDEP web site: mass.gov/dep

From: Miano, John (DEP)
Sent: Tuesday, May 24, 2016 2:48 PM
To: 'Casey, Carolyn'
Cc: Wainberg, Daniel; Knox, Rosemary (DEP)
Subject: RE: draft USM order for your review

Hi Carolyn,
I will review the documents this week.
Jack

John F. Miano
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Bureau of Waste Site Clean-up

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]
Sent: Monday, May 23, 2016 5:20 PM
To: Knox, Rosemary (DEP); Miano, John (DEP)
Cc: Wainberg, Daniel
Subject: draft USM order for your review

Please see the attached draft documents for the former USM site in Beverly MA. Would it be possible to review as soon as possible but no later than COB next Tuesday?

Thanks
Carolyn

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